

Joseph H. Harrington  
United States Attorney  
Eastern District of Washington  
David M. Herzog  
Assistant United States Attorney  
Post Office Box 1494  
Spokane, WA 99210-1494  
Telephone: (509) 353-2767

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON  
**JUN 20 2018**  
SEAN F. McAVOY, CLERK  
DEPUTY  
SPOKANE, WASHINGTON

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

JONATHAN PAUL HOLDEN  
(a/k/a "PNWBJ123@gmail.com" and  
"Bun Mert"),

Defendant.

**4:18-CR-6036-SMJ**

INDICTMENT

Vio: 18 U.S.C. § 2422(b):  
Attempted Enticement of a Minor  
(Count 1)

18 U.S.C. § 2251(a), (e):  
Production of Child Pornography  
(Counts 2, 3)

18 U.S.C. § 2251(a), (e):  
Attempted Production of Child  
Pornography  
(Count 4)

18 U.S.C. § 2252A(a)(2)(A), (b)(1):  
Receipt of Child Pornography  
(Count 5)

18 U.S.C. § 2252A(a)(5)(B), (b)(2):  
Possession of Child Pornography  
(Count 6)

18 U.S.C. § 2253, 18 U.S.C. § 2428  
Forfeiture Allegations

1           The Grand Jury Charges:

2                                   COUNT 1

3           On or about February 6, 2018, in the Eastern District of Washington and  
4 elsewhere, the Defendant, JONATHAN PAUL HOLDEN (a/k/a  
5 “PNWBJ123@gmail.com” and “Bun Mert”) did unlawfully and knowingly use a  
6 facility and means of interstate and foreign commerce, namely, the Internet, to  
7 attempt to persuade, induce, entice, and coerce an individual who had not attained  
8 the age of 18 years, to wit, S.C., a minor girl whom Defendant believed to be 13  
9 years of age, to engage in sexual activity for which a person can be charged with a  
10 criminal offense, including Wash. Rev. Code § 9A.44.076, Rape of a Child in the  
11 Second Degree, and attempt to do so, all in violation of 18 U.S.C. § 2422(b).  
12

13  
14                                   COUNT 2

15           Between on or about February 23, 2016, and on or about April 1, 2016, in  
16 the Eastern District of Washington and elsewhere, the Defendant, JONATHAN  
17 PAUL HOLDEN (a/k/a “PNWBJ123@gmail.com” and “Bun Mert”) did  
18 knowingly employ, use, persuade, induce, entice, and coerce S.N., a minor girl  
19 who was 13 years of age, to engage in sexually explicit conduct for the purpose of  
20 producing a visual depiction of such conduct, knowing and having reason to know  
21 that such visual depiction would be transmitted using any means and facility of  
22 interstate commerce and using materials that had been mailed, shipped, and  
23 transported in and affecting interstate and foreign commerce by any means,  
24 including by computer, all in violation of 18 U.S.C. § 2251(a), (e).  
25  
26  
27  
28

## COUNT 3

Between on or about February 5, 2018, and on or about February 6, 2018, in the Eastern District of Washington and elsewhere, the Defendant, JONATHAN PAUL HOLDEN (a/k/a “PNWBJ123@gmail.com” and “Bun Mert”) did knowingly employ, use, persuade, induce, entice, and coerce K.O., a minor girl who was 15 years of age, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transmitted using any means and facility of interstate commerce and using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, all in violation of 18 U.S.C. § 2251(a), (e).

## COUNT 4

On or about February 5, 2018, in the Eastern District of Washington and elsewhere, the Defendant, JONATHAN PAUL HOLDEN (a/k/a “PNWBJ123@gmail.com” and “Bun Mert”) did knowingly attempt to employ, use, persuade, induce, entice, and coerce R.R., a minor girl who was 17 years of age, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transmitted using any means and facility of interstate commerce and using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, all in violation of 18 U.S.C. § 2251(a), (e).

## COUNT 5

On or about February 6, 2018, in the Eastern District of Washington and elsewhere, the Defendant, JONATHAN PAUL HOLDEN (a/k/a “PNWBJ123@gmail.com” and “Bun Mert”) did knowingly receive child pornography, as defined in 18 U.S.C. § 2256(8)(A), that had been mailed, shipped and transported in interstate commerce by any means, including by computer, to wit: visual depictions of K.O., a minor girl who was 15 years of age, engaging in sexually explicit conduct, including the lascivious exhibition of her genitals and pubic area, in violation of 18 U.S.C. § 2252(a)(2)(A), (b)(1).

## COUNT 6

On or about February 6, 2018, in the Eastern District of Washington and elsewhere, the Defendant, JONATHAN PAUL HOLDEN (a/k/a “PNWBJ123@gmail.com” and “Bun Mert”) did knowingly possess material which contained one or more visual depictions of child pornography, as defined in 18 U.S.C. § 2256(8)(A), the production of which involved the use of a minor engaging in sexually explicit conduct, and which visual depictions were of such conduct; that had been mailed, shipped and transported in interstate and foreign commerce, and which was produced using materials which had been mailed, shipped, or transported in interstate or foreign commerce, by any means including computer, all in violation of 18 U.S.C. § 2252(a)(5)(B), (b)(2).

## NOTICE OF FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 18 U.S.C. § 2428, upon conviction of an offense(s) in violation of 18 U.S.C. § 2422 as charged in Count 1 of this Indictment, the Defendant,

JONATHAN PAUL HOLDEN (a/k/a “PNWBJ123@gmail.com” and “Bun Mert”), shall forfeit to the United States of America, any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the offense(s) and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense(s). The property to be forfeited includes, but is not limited to:

- One Apple iPhone 7 Plus cellular telephone, model number A1784, serial number F2LTH13NHX9K; and
- One Apple iPad Air tablet device, model number MF004, serial number DMPP54S1F4YF.

If any of the property described above, as a result of any act or omission of the defendant[s]:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

Pursuant to 18 U.S.C. § 2253, upon conviction of an offense in violation of 18 U.S.C § 2251(a), (e), 18 U.S.C § 2252A(a)(2), (b)(1), or 18 U.S.C. § 2252A(a)(5)(B), (b)(2), as charged in Counts 2 – 6 of this Indictment, the Defendant, JONATHAN PAUL HOLDEN (a/k/a “PNWBJ123@gmail.com” and “Bun Mert”) shall forfeit to the United States of America any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of that chapter, or any book, magazine, periodical, film, videotape, or other matter which contains

1 any such visual depiction, which was produced, transported, mailed, shipped or  
2 received in violation of this chapter; any property, real or personal, constituting or  
3 traceable to gross profits or other proceeds obtained from such offenses; and, any  
4 property, real or personal, used or intended to be used to commit or to promote the  
5 commission of such offenses, or any property traceable to such property. The  
6 property to be forfeited includes, but is not limited to:

- 7       • One Apple iPhone 7 Plus cellular telephone, model number A1784,  
8       serial number F2LTH13NHX9K; and
- 9       • One Apple iPad Air tablet device, model number MF004, serial  
10      number DMPP54S1F4YF.

11  
12       If any of the property described above, as a result of any act or omission of  
13 the Defendant:

- 14       a.     cannot be located upon the exercise of due diligence;
- 15       b.     has been transferred or sold to, or deposited with, a third party;
- 16       c.     has been placed beyond the jurisdiction of the Court;
- 17       d.     has been substantially diminished in value; or
- 18       e.     has been commingled with other property which cannot be  
19       divided without difficulty,

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

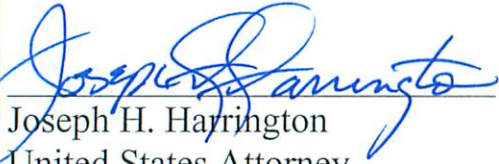
28 //



1 the United States of America shall be entitled to forfeiture of substitute property  
2 pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b).

3  
4 DATED this 20 day of June, 2018.

5  
6 A TRUE BILL  
7  
8  
9

10  
11   
12 Joseph H. Harrington  
United States Attorney

13  
14   
15 David M. Herzog  
16 Assistant United States Attorney  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28